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***Additional Counsel in Signature Block***

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

CITY OF RICHMOND AND THE RICHMOND  
JOINT POWERS FINANCING AUTHORITY,

Plaintiffs,

v.

ROYAL BANK OF CANADA, JP MORGAN  
CHASE, PUBLIC RESOURCES ADVISORY  
GROUP, AND THE MAJORS GROUP

Defendants.

No. 3:25-cv-03348-CRB

**JOINT STIPULATION AND ~~[PROPOSED]~~  
ORDER REGARDING CASE  
MANAGEMENT DEADLINES**

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Civil Local Rule 6-2, Plaintiffs City of Richmond and Richmond Joint Powers Financing Authority (collectively, “Plaintiffs”) and Defendants Royal Bank of Canada and Public Resources Advisory Group (collectively, “Defendants,”<sup>1</sup> and, together with Plaintiffs, “the Parties”), by and through their counsel, hereby stipulate as follows:

WHEREAS, on June 23, 2025, the Court entered the Parties’ Joint Stipulation To Extend Current Case Deadlines (ECF No. 21);

<sup>1</sup> Though named as a defendant in the caption above, the Amended Complaint, ECF No. 22, no longer asserts any claims against JPMorgan Chase Bank N.A. (“JPMC”), which is no longer a party to this Action. Further, despite numerous attempts, Plaintiffs have not yet been able to effectuate service on defendant The Majors Group.

1 WHEREAS, pursuant to the deadlines established by ECF No. 21, on July 9, 2025, Plaintiffs  
2 filed an amended complaint in this Action (the “Unjust Enrichment Action”) (ECF No. 22); on July 30,  
3 2025, the Parties met and conferred regarding initial disclosures, early settlement, ADR process  
4 selection, and discovery plan; and on July 30, 2025, the Parties filed ADR Certifications (ECF Nos.  
5 23-25);

6 WHEREAS, on August 12, 2025, the Court entered a stipulation staying the remaining case  
7 deadlines established by ECF No. 21 because the City Attorney for the City of Richmond, the  
8 prosecuting authority for Plaintiffs (“Plaintiffs’ Prosecuting Authority”), filed a California False  
9 Claims Act case against Royal Bank of Canada and JPMC based on allegations related to this action  
10 that remained under seal (the “CA FCA Action”), and the parties to the Unjust Enrichment Action  
11 agreed that, once the CA FCA Action was unsealed, they would seek relation of the two actions (ECF  
12 No. 27);

13 WHEREAS, on September 30, 2025, the parties to the Unjust Enrichment Action moved to  
14 relate the CA FCA Action to this case (ECF No. 28);

15 WHEREAS, on October 1, 2025, the Court entered an order relating the CA FCA Action to this  
16 case (ECF No. 30);

17 WHEREAS, the parties to the two actions met and conferred and determined that, since  
18 Plaintiffs’ Prosecuting Authority intended to amend the complaint in the CA FCA Action, the parties  
19 should wait to set further deadlines until after the amendment is filed so that they can confer regarding  
20 whether they will stipulate to consolidate the actions and, if so, for what purposes;

21 WHEREAS, the Court entered a stipulated order providing a deadline of December 5, 2025 for  
22 Plaintiffs’ Prosecuting Authority to file an amended complaint in the CA FCA Action and a deadline  
23 of 14 days after the amended CA FCA Action complaint is filed for the parties to jointly propose new  
24 case management deadlines to replace the deadlines in ECF No. 21 that this Court stayed in ECF No.  
25 27 (ECF No. 34);

26 WHEREAS Plaintiffs’ Prosecuting Authority to filed an amended complaint in the CA FCA  
27 Action on December 5, 2025, and the parties are continuing to confer regarding new case management  
28 deadlines and coordination with the CA FCA action;

1 NOW, THEREFORE, THE PARTIES STIPULATE AND PROPOSE that:

- 2 1. On or before December 23, 2025, the parties shall jointly propose new case  
3 management deadlines to replace the deadlines in ECF No. 21 that this Court stayed in  
4 ECF No. 27.

5  
6 Submitted this 19th Day of December, 2025.

7 KELLER ROHRBACK L.L.P.

8  
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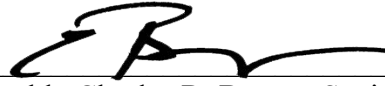
Facsimile: (212) 755-7306

*Attorneys for Defendant Royal Bank of Canada*

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

2  
3 December 31, 2025

4 Date



5 The Honorable Charles R. Breyer, Senior District Judge  
6 United States District Court for the Northern District of  
7 California  
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